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9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

No. CR 18-839-SJO

13 Plaintiff,

JOINT STATEMENT RE:
DISCOVERY CONFERENCE

14 v.

15 JAMES R. MCDANIEL,

16 Defendant.
17

18 Pursuant to the Court's Discovery and Trial Order in Criminal
19 Cases, plaintiff United States of America, by and through its counsel
20 of record, the United States Attorney for the Central District of
21 California and Assistant United States Attorney Ruth C. Pinkel, and
22 defendant JAMES MCDANIEL, by and through his counsel of record,
23 Deputy Federal Public Defender Seema Ahmad, hereby file this joint
24 statement regarding their discovery conference:

25 1. Assistant United States Attorney Ruth C. Pinkel and defense
26 counsel, Seema Ahmad conferred telephonically regarding discovery
27 matters on January 28, 2019.
28

1 2. The parties estimate that trial will last approximately 2-3
2 days.

3 3. There are no contested matters of discovery or inspection
4 at this time.

5 4. There are no contemplated motions at this time. The
6 parties reserve the right to file any motions, as needed, at a later
7 date.

8 5. The government is aware of its continuing discovery
9 obligations, including those within the meaning of Brady v. Maryland,
10 373 U.S. 83 (1963), and intends to comply with those obligations.

11 6. The parties anticipate filing a stipulation and proposed
12 order with the Court to continue trial in this matter.

13 Dated: January 28, 2019

Respectfully submitted,

14 NICOLA T. HANNA
United States Attorney

15 LAWRENCE S. MIDDLETON
16 Assistant United States Attorney
17 Chief, Criminal Division

18 /s/ Ruth C. Pinkel
19 RUTH C. PINKEL
Assistant United States Attorney

20 Attorneys for Plaintiff
21 UNITED STATES OF AMERICA

22 Dated: January 28, 2019

23 /s/ Seema Ahmad [e-mail auth.]
SEEMA AHMAD

24 Attorney for Defendant
JAMES MCDANIEL